



*South Carolina*  
**DEPARTMENT OF CONSUMER AFFAIRS**  
293 Greystone Boulevard Suite 400  
P. O. BOX 5757  
COLUMBIA, SC 29250-5757

Carri Grube Lybarker  
Administrator/  
Consumer Advocate

**PROTECTING CONSUMERS SINCE 1975**

Commissioners  
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Columbia  
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Summerville

April 14, 2021

**VIA ELECTRONIC FILING**

The Honorable Jocelyn Boyd  
Chief Clerk/Executive Director  
The Public Service Commission of South Carolina  
101 Executive Center Drive  
Columbia, South Carolina 29210

RE: Docket No. 2021-90-E  
Duke Energy Progress, LLC's 2021 Avoided Cost Proceeding Pursuant to S.C. Code Ann.  
Section 58-41-20(A)

Dear Ms. Boyd:

Please find enclosed for filing the Petition to Intervene on behalf of the South Carolina Department of Consumer Affairs. As indicated on the Certificate of Service, all parties of record will be served via electronic mail.

Regards,

Roger Hall, Esq.  
*Deputy Consumer Advocate*

Enclosures

Cc: Parties of Record (via email)

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-90-E**

IN RE: )  
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Duke Energy Progress, LLC's 2021 )  
Avoided Cost Proceeding Pursuant to )  
S.C. Code Ann. Section 58-41-20(A) )  
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**PETITION TO INTERVENE**

Carri Grube Lybarker, Administrator and Consumer Advocate for the South Carolina Department of Consumer Affairs ("Department"), respectfully petitions the South Carolina Public Service Commission ("Commission") for permission to intervene in the above referenced Docket pursuant to R. 103-825 of the Commission's rules of practice and procedure. In support of this petition, Petitioner states as follows:

1. On March 10, 2021, the Commission opened docket 2021-90-E for Duke Energy Progress, LLC's 2021 Avoided Cost Proceeding review pursuant to S.C. Code Ann. Section 58-41-20(A).
2. Pursuant to S.C. Code Ann. § 37-6-604 (2018), the Department may provide legal representation of the consumer interest before state and federal regulatory agencies when such agencies undertake to fix rates or prices for consumer products or services and may intervene as a party to advocate for the interest of consumers before the South Carolina Public Service Commission. In that capacity the Consumer Advocate does hereby petition to intervene as a formal party of record in Docket No. 2021-90-E.
3. The Department works to avoid excessive, inadequate, and unwarranted rate increases; however, a position has not yet been fully developed on this matter. Petitioner reserves the right to set forth her position more fully as necessary and appropriate as this proceeding moves forward.

4. Counsel representing the Consumer Advocate/Department in this proceeding are:

Carri Grube Lybarker, Esquire  
Roger P. Hall, Esquire  
Connor J. Parker, Esquire  
**S.C. Department of Consumer Affairs**  
293 Greystone Blvd., Suite 400  
P.O. Box 5757  
Columbia, South Carolina 29250-5757  
Phone: (803) 734-0045  
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Email: [rhall@scconsumer.gov](mailto:rhall@scconsumer.gov)  
Email: [cjparker@scconsumer.gov](mailto:cjparker@scconsumer.gov)

5. The Consumer Advocate/Department consent to service via electronic mail and request all communications regarding this docket be directed to counsel of record noted above.

**WHEREFORE**, Petitioner, in order to represent the consumer interest of the State of South Carolina, requests the Commission grant this Petition to Intervene and make Petitioner a formal party of record, allowing Petitioner to actively participate in this proceeding.

Carri Grube Lybarker, Esquire  
Administrator / Consumer Advocate

By: s/ Carri Grube Lybarker  
S.C. Department of Consumer Affairs  
293 Greystone Blvd., Suite 400  
P.O. Box 5757  
Columbia, South Carolina 29250-5757  
Phone: (803) 734-0045

April 14, 2021  
Columbia, South Carolina

**STATE OF SOUTH CAROLINA  
BEFORE THE PUBLIC SERVICE COMMISSION  
DOCKET NO. 2021-90-E**

IN RE: )  
 )  
Duke Energy Progress, LLC's 2021 )  
Avoided Cost Proceeding Pursuant to )  
S.C. Code Ann. Section 58-41-20(A) )  
\_\_\_\_\_ )

**CERTIFICATE OF SERVICE**

I hereby certify I have caused to be served this day the **Petition to Intervene** to the individuals listed below via electronic mail as follows:

**Duke Energy Progress, LLC**  
Rebecca J. Dulin  
Heather Shirley Smith  
[Rebecca.Dulin@duke-energy.com](mailto:Rebecca.Dulin@duke-energy.com)  
[heather.smith@duke-energy.com](mailto:heather.smith@duke-energy.com)

**Office of Regulatory Staff**  
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**South Carolina Coastal Conservation  
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**Carolinas Clean Energy Business  
Association**  
Richard L. Whitt  
[Richard@rlwhitt.law](mailto:Richard@rlwhitt.law)

*s/ Eliza Mecaj*

\_\_\_\_\_  
Eliza Mecaj, PP

April 14, 2021  
Columbia, South Carolina